

Mark R. Borghese
Email: mark@borgheselegal.com
Borghese Legal, Ltd.
10161 Park Run Drive, Suite 150
Las Vegas, NV 89145
702-382-0200
Fax: 702-382-0212

Reza Mirzaie
Email: rmirzaie@raklaw.com

Paul S. Kroeger
Email: pkroeger@raklaw.com

Stanley H. Thompson, Jr.
Email: sthompson@raklaw.com

C. Jay Chung
Email: jchung@raklaw.com
Russ, August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025
310-826-7474
Fax: 310-826-6991

Attorneys for Plaintiff 2-Way Computing, Inc.

Kelly H. Dove
Email: kdove@swlaw.com
Snell & Wilmer
Hughes Center
3883 Howard Hughes Parkway, Suite 1100
Las Vegas, NV 89169
702-784-5200
Fax: 702-784-5252

*Attorney for Defendants AT&T Mobility LLC and
AT&T Mobility II LLC*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

2-WAY COMPUTING, INC.,

Plaintiff,

vs.

AT&T MOBILITY LLC and AT&T
MOBILITY II LLC,

Defendants.

CASE NO. 2:15-cv-02230-GMN-VCF

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO EXTEND DEADLINE TO
RESPOND TO COMPLAINT**

(Second Request)

Plaintiff 2-Way Computing, Inc. ("2-Way") and Defendants AT&T Mobility LLC and AT&T Mobility II LLC (collectively, "ATTM") by and through their counsel, hereby file this Stipulation and [Proposed] Order to Extend the Deadline to Respond to Complaint. This request complies with Local Rules ("LR") 6-1, 6-2, and 7-1. The litigation of this matter will be best served by the proposed extension. This is the second request to extend the response deadline. This request is not made after the response deadline.

The Complaint [Doc. No. 1] was filed on November 25, 2015. Defendant ATTM was served with the summons and complaint on December 16, 2015. The current deadline to respond to the Complaint is February 5, 2016.

Pursuant to an email exchange with ATTM, Plaintiff is agreeable to an extension of time for ATTM to investigate the allegations of the Complaint. Plaintiff agrees to extend the deadline for ATTM to respond to the Complaint for an additional thirty (30) days, until March 7, 2016.

Accordingly, Plaintiff and Defendants respectfully request that the Court grant this request to continue the deadline to respond to the Complaint.

Respectfully Submitted,

Dated: February 2, 2016

RUSS, AUGUST & KABAT

By: /s/ Reza Mirzaie

Reza Mirzaie
Pro Hac Vice
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025
310-826-7474
Fax: 310-826-6991
Attorney for Plaintiff

Dated: February 2, 2016

SNELL & WILMER

By: /s/ Kelly H. Dove

Kelly H. Dove, Esq.
Nevada Bar No. 10569
10161 Park Run Drive, Suite 150
Las Vegas, NV 89145
702-382-0200
Fax: 702-382-0212
Attorney for Defendants

ORDER

IT IS SO ORDERED.

DATED this 2nd day of February, 2016.



U.S. MAGISTRATE JUDGE

23439036